

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
RENE GRIGGS

**VERIFIED
COMPLAINT**

Plaintiff,

-against-

**JURY TRIAL
DEMANDED**

CABLEVISION SYSTEMS CORPORATION

Defendant.
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Plaintiff by her attorneys, **LAW OFFICES OF PETER P. TRAUB** complaining of the Defendants, respectfully alleges, upon information and belief:

JURISDICTIONAL STATEMENT

i) That at all times herein mentioned, the Plaintiff was, and still is a resident of the State of New Jersey.

ii) That at all times herein mentioned, the Defendant **CABLEVISION SYSTEMS CORPROATION** was and still is a foreign corporation duly authorized to do business in the State of New York, maintaining a principle place of business at 1111 Stewart Avenue, Bethpage, New York.

iii) That at all times herein mentioned, the Defendant **CABLEVISION SYSTEMS CORPROATION**, maintained a principal place of business in the County of Nassau, State of New York.

iv) The matter in controversy exceeds, exclusive of interest and costs, the sum specified by 28 USC 1332

FIRST CAUSE OF ACTION

v) That at all times herein mentioned, the Defendant, **CABLEVISION SYSTEMS CORPROATION** owned the premises and appurtenances and fixtures

thereto, located at Madison Square Garden, 2-4 Penn Place, New York, New York (hereinafter "Madison Square Garden)..

vi) That at all times herein mentioned, and upon information and belief, the Defendant, **CABLEVISION SYSTEMS CORPROATION** managed the aforesaid premises.

vii) That at all times herein mentioned, and upon information and belief, the Defendant, **CABLEVISION SYSTEMS CORPROATION** controlled the aforesaid premises.

viii) That at all times herein mentioned, and upon information and belief, the Defendant, **CABLEVISION SYSTEMS CORPROATION** maintained the aforesaid premises.

ix) That at all times herein mentioned, and upon information and belief, the Defendant, **CABLEVISION SYSTEMS CORPROATION** repaired the aforesaid premises.

x) On April 16, 2006 Plaintiff **RENE GRIGGS** was lawfully on the aforesaid premises.

xi) On April 16, 2006, while Plaintiff **RENE GRIGGS** was lawfully about the aforesaid premises she was caused to fall and sustain serious and permanent injuries.

xii) The above mentioned occurrence, and the results thereof, were caused by the negligence of the Defendant and/or said Defendant's agents, servants, employees and/or licensees in the ownership, operation, management, supervision, maintenance and control of the aforesaid premises.

xiii) That no negligence on the part of the Plaintiff contributed to the occurrence alleged herein in any manner whatsoever.

xiv) That by reason of the foregoing, Plaintiff **RENE GRIGGS** was caused to sustain serious injuries and to have suffered pain, shock and mental anguish; that these injuries and their effects will be permanent; and as a result of said injuries Plaintiff has been caused to incur, and will continue to incur, expenses for medical care and attention; and, as a further result, Plaintiff was, and will continue to be, rendered unable to perform Plaintiff's normal activities and duties and has sustained a resultant loss therefrom.

xv) That as a result of the foregoing, Plaintiff was damaged in the amount of ONE MILLION (\$1,000,000.00) DOLLARS.

16. This action falls within one or more of the exceptions to Article 16 of the CPLR.

WHEREFORE, Plaintiff demands judgment against the Defendants herein, in a sum the amount of ONE MILLION (\$1,000,000.00) DOLLARS., together with the costs and disbursements of this action.

Dated: New York, New York
January 28, 2008

Yours, etc.

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